

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

IN RE HATTERAS FINANCIAL, INC.)
SHAREHOLDER LITIGATION) Lead Case No. 1:16-cv-00445
) Judge Thomas D. Schroeder
)
)
)

MASTER FILE

THIS DOCUMENT RELATES TO:)
ALL ACTIONS)
)

**CO-LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CERTIFICATION OF THE SETTLEMENT CLASS
AND APPLICATION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES**

Co-Lead Plaintiffs James Wilson (“Plaintiff Wilson”) and William Friedman (“Plaintiff Friedman”) (collectively, “Co-Lead Plaintiffs” or “Plaintiffs”) submit this motion and hereby respectfully moves this Court, pursuant to Fed. R. Civ. P. 23, for entry of the [Proposed] Order and Final Judgment (the “Order and Final Judgment”) that will provide the following: (1) certification of a class in connection with the proposed settlement (the “Settlement”) of this action (the “Action”); (2) approval of the Settlement, pursuant to the Stipulation of Settlement, dated May 4, 2017 and filed with the Court on May 5, 2017 (the “Stipulation”);¹ (3) approval of an award of attorneys’ fees and expenses in the aggregate of \$700,000 for the services Plaintiffs’ Counsel rendered in the successful prosecution and settlement of the Action (“Fee and Expense Award”); and (4) entry of the Order and Final Judgment,² and (5) granting such other relief as this Court may deem just and proper.

In support of this Motion, Co-Lead Plaintiffs submit herewith a Memorandum of Law and the Declaration of James M. Wilson, Jr. in Support of Co-Lead Plaintiffs’ Motion for Final Approval of Settlement, which contains the Stipulation without exhibits. The [Proposed] Order and Final Judgment is being filed as an attachment to this Motion.

¹ The Stipulation (without exhibits) is attached as Exhibit 1 to the accompanying Declaration of James M. Wilson, Jr. in Support of Co-Lead Plaintiffs’ Motion for Final Approval of Settlement, Certification of The Settlement Class And Approval of Attorneys’ Fees (“Wilson Decl.”). All capitalized terms that are not otherwise defined herein shall have the same definitions as set forth in the Stipulation of Settlement.

² While all parties seek entry of the Final Order and Judgment, and Defendants do not oppose this Motion, this Motion and accompanying Memorandum of Law is submitted by Co-Lead Plaintiffs and do not necessarily represent the views of Defendants as to each and every statement made herein.

DATED: October 19, 2017

/s/ James M. Wilson, Jr.

James M. Wilson, Jr. (Notice of
Special Appearance filed)
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